

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Zachary Tyler Worley

Case:2:19-mj-30068


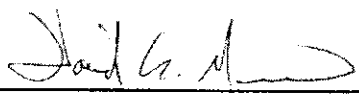
Judge: Unassigned,

Filed: 02-18-2019 At 09:01 AM

USA V WORLEY (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 2018 to present in the county of Wayne and Oakland in the
Eastern District of Michigan, the defendant(s) violated:*Code Section*18 U.S.C. Sections 2252A(a)(2) and A(a)(5)(b)
18 U.S.C. Section 2422(b)
21 U.S.C. Sections 841 and 859(a)*Offense Description*Receipt and possession of child pornography
Enticement of a minor
Distribution of a controlled substance to a person under the age of twenty-oneThis criminal complaint is based on these facts:
See attached AFFIDAVIT☒ Continued on the attached sheet.Sworn to before me and signed in my presence, and/or by reliable
electronic means.Date: February 18, 2019City and state: Detroit, Michigan
Complainant's signatureAndrew Carriger, Task Force Officer (FBI)
Printed name and title
Judge's signatureHon. David R. Grand, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Andrew Carriger, a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), Detroit Division, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am employed by the Romulus Police Department and currently assigned to the Southeast Michigan Trafficking and Exploitation Crimes task force (SEMTEC), and have been since January 2016. I have investigated federal criminal violations related to Human Trafficking, Internet fraud, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training and everyday work related to conducting these types of investigations. As a deputized task force officer, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for ZACHARY TYLER WORLEY (DOB 1/XX/1994) for violations of 18 U.S.C. § 2422(b) (Enticement of a Minor), 18 U.S.C. §§ 2252A(a)(2) and A(a)(5)(b) (Possession and Receipt of Child Pornography), and 21 U.S.C §§ 841 and 859(a) (Distribution of Controlled Substance to a Person Under the Age of Twenty-One).

PROBABLE CAUSE

3. On February 15, 2019, Romulus Police was dispatched to 6XXX Panam St., Romulus, Michigan, reference a possible runaway/kidnapping. Upon arrival, officers spoke with the homeowner (hereinafter CW-1), who stated a male that was staying with him, Zach (WORLEY), had gone to the Greyhound bus station with a juvenile female, hereinafter referred to as "Minor Victim 1" or "MV-1" (DOB XX/XX/2003)

4. CW-1 had gone to MV-1's residence and notified MV-1's father. CW-1 told the father that MV-1 was at his residence with WORLEY. The father then followed CW-1 back to his residence.

5. Once at the residence, CW-1 and MV-1's father discovered that WORLEY and MV-1 had left to go to the Greyhound bus station in Detroit, Michigan. CW-1 and the father contacted Romulus Police who came to CW-1's residence. Romulus Police contacted the Michigan State Police and asked if a trooper could go to the Greyhound bus station and look for MV-1 and WORLEY. The MSP trooper was able to locate MV-1 and WORLEY. On February 16, 2019, WORLEY was arrested and transported back to the Romulus Police Department.

6. At the time of arrest, WORLEY had a cellular phone (Samsung Galaxy) in his possession which was taken and placed into property at the Romulus Police Department.

7. On the date of WORLEY's arrest, Affiant and SA Raymond Nichols of the FBI, conducted an interview of CW-1 at his residence. CW-1 provided in part the following information:

- a. CW-1 met MV-1 and WORLEY through an internet chat group;
- b. MV-1's social media profile indicated that she was 19 years-old and from California, though she had told CW-1 and others that she resided in Michigan;
- c. While MV-1 was staying at CW-1's residence, CW-1 had an opportunity to observe MV-1 and he believed that she was much younger than 19 years-old;
- d. CW-1 told WORLEY that he was concerned that MV-1 was under age, and he did not want to get in trouble for allowing her to live in his residence. CW-1 asked WORLEY and MV-1 to provide an ID or other documents to prove her age. Those documents were not provided;
- e. CW-1 frequently told WORLEY that he was concerned that MV-1 was 14 or 15 years-old;

- f. CW-1 had observed MV-1 using a school laptop to complete her home school assignments, which further indicated to him that she was under 18 years old; and
- g. WORLEY indicated to CW-1 that he was going to move back to Texas, and take MV-1 with him. WORLEY asked CW-1 to drive him and MV-1 to the Greyhound station in Detroit. CW-1 refused and told WORLEY that the only place he would take MV-1 was back to her father in Oakland County.

8. On February 16, 2019, Affiant and SA Nichols of the FBI, conducted an interview of WORLEY in interview room #1, at the Romulus Police Department. WORLEY was advised of his Miranda rights, which he stated he understood and agreed to answer questions. WORLEY then provided the following information:

- a. WORLEY met MV-1 online in a "Meetme" chat group. "Meetme" is a social media platform designed for people to meet other people all across the world. "Meetme" is internet based;
- b. WORLEY and MV-1 became friends and eventually, WORLEY traveled to Michigan. WORLEY was staying with CW-1 in Romulus and on February 6, 2019, WORLEY and CW-1 went to MV-1's residence to pick her up;

- c. MV-1 spent approximately a week with WORLEY at CW-1's residence. WORLEY and MV-1 had their own room. WORLEY stated that him and CW-1 built a room attached to the kitchen for him and MV-1 to stay in;
- d. After the first week with MV-1, WORLEY stated they took MV-1 home. On February 13, they picked MV-1 up again and brought her back to CW-1's residence;
- e. WORLEY was told by CW-1 that he did not believe that MV-1 was 19 years-old. CW-1 told WORLEY that he believed she was "under age;"
- f. WORLEY had observed MV-1 completing her home school assignments on a laptop computer. WORLEY indicated that she spent a few hours at a time doing her assignments on the computer;
- g. WORLEY stated that on Valentine's Day, he engaged in sexual intercourse with MV-1. WORLEY stated he had sexual intercourse with her "a couple times" on that day;
- h. WORLEY was asked about any narcotics he had used while at CW-1's residence, LSD in particular. WORLEY stated he had brought some LSD from California to Michigan. WORLEY stated one of the days he and MV-1 were together, they both took the LSD. WORLEY

stated he split the LSD he had, and MV-1 took the “Sponge Bob” half because she liked Sponge Bob.

- i. WORLEY also stated that before meeting in person, he had exchanged nude photographs and videos with MV-1. WORLEY stated he had sent MV-1 explicit photographs of himself and MV-1 had sent him sexually explicit photographs. WORLEY also stated MV-1 had sent him a video of her masturbating and said that this video was most likely on his phone;
- j. WORLEY provided Affiant with the location of MV-1’s cellular phone. While walking to the Greyhound Station, WORLEY stated that MV-1 placed her cellular telephone in a stack of tires at an auto store next to a gas station near CW-1’s residence in Romulus. MV-1 told WORLEY that she was leaving the phone so her father could not track her location; and
- k. WORLEY was alerted by a friend that the police were coming to find him. At that time, WORLEY created a video of him instructing MV-1 to say she had lied about her age and to say she was sorry for involving WORLEY. WORLEY posted the video to social media. WORLEY had created the video to “prove” that he had no idea that MV-1 was fifteen years old.

9. Affiant and SA Nichols went to 27315 Van Born Rd., Taylor, Michigan. In front of the business was a stack of tires. Affiant and SA Nichols located a black, LG cellular phone in the first tire. That is exactly where WORLEY stated MV-1's cellular phone was.

10. A search warrant was completed by Affiant and signed by Michigan 34th District Court, Judge Green, for the contents of the cellular phones.

11. Affiant reviewed the contents on WORLEY's phone, which included the following:

- a. In the "Gallery" section of WORLEY's phone, there are several photographs and videos. In one video dated February 9, 2019, WORLEY is holding LSD. WORLEY states that "Spicy" (MV-1) is "geeking out" about the Sponge Bob portion. Affiant knows that LSD is a Schedule I controlled substance;
- b. There are also several screenshot photographs of MV-1 dated November 21, 2018. WORLEY's photograph is in the top right corner of many of these screenshots, which suggests he took these screenshots while he and MV-1 were live video chatting with each other. In the photographs, MV-1 is wearing nothing but black thong underwear. The focal point of the photographs is MV-1's groin area, where there appears to be a sexual toy between her legs. Towards the

end of the screen shots, MV-1 is laying on her back, with her legs open and is using the toy on herself. Affiant has reviewed these screenshots, and several of them meet the Federal definition of child pornography. Moreover, in reviewing the screenshots on this date and images of MV-1 from earlier dates on the phone, based on her physical and facial features, it is evident that MV-1 is a minor.

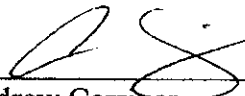
- c. There are text messages between WORLEY and “My Spicy Rainbow” (MV-1) on WORLEY’s cellular phone. It is evident from MV-1’s comments that MV-1 is likely a minor. For example, MV-1 and WORLEY had the following conversation on February 4, 2019:

Monday, February 4, 2019 9:46pm to 10:26pm

MV-1	Holy shiet
WORLEY	I’m safe and riding the bus
MV-1	Rawwwr
MV-1	My mom brought cookies
MV-1	Oooooommggg she brought cookies

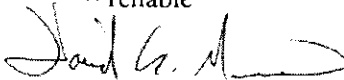
CONCLUSION

12. For the reasons set forth above, I believe probable cause exists that **ZACHARY TYLER WORLEY**, did violate 18 U.S.C. § 2422(b) (Enticement of a Minor), 18 U.S.C. §§ 2252A(a)(2) and A(a)(5)(b) (Possession and Receipt of Child Pornography), and 21 U.S.C §§ 841 and 859(a) (Distribution of Controlled Substance to a Person Under Age Twenty-One).



Andrew Carriger
Task Force Officer
Federal Bureau of Investigation

Sworn and subscribed to before me
through electronic means:
^ reliable



David R. Grand
United States Magistrate Judge
Eastern District of Michigan

Dated: February 18, 2019
